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November 7, 2022

Via ECF

Hon. Marcia M. Henry
United States District Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Gao v. Yu et al.
Civil Action No. 1:21-cv-06308-DG-MMH

Dear Judge Henry:

Our firm represents both Defendants in the above-referenced case. We write jointly with Plaintiff pursuant to this Court's order of September 7, 2022 (ECF 46), which directed the parties to file a joint status report regarding "discovery progress and the status of any settlement discussions" by today, November 7, 2022.

The parties have exchanged initial discovery requests and corresponding responses without incident. No demands are currently pending, although objections have been raised and rights reserved by both sides.

As for settlement, the parties have not had substantive discussions since the conclusion of mediation in August. Defendant Yu has repeatedly requested that Plaintiff provide a final compromise offer to assist Defendant Yu as she contemplates bankruptcy. However, Plaintiff has repeatedly declined to do so, maintaining that her offer is the demand as stated in the pleadings.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John J. Thompson', written over a horizontal line.

John J. Thompson, Esq.
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